

**BALDASSARE  
& MARA, LLC**  
Attorneys at Law

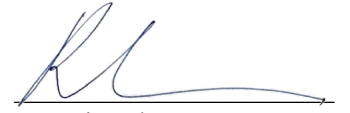
**VIA ECF**

September 30, 2020

The Honorable Ronnie Abrams,  
United States District Judge  
United States District Court for the Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Application granted.

SO ORDERED.

  
Ronnie Abrams, U.S.D.J.  
October 1, 2020

Re: United States v. Ajit Singh, et al., Case No. 19-cr-339 (RA)

Dear Judge Abrams:

This firm represents Defendant Ajit Singh in the above-referenced matter. Together with our co-counsel, Steven Brill, the attorney for Gulsahil Singh, we respectfully request a modification of the respective bail conditions of Ajit and Gulsahil Singh.

As the Court is aware, Ajit and Gulsahil Singh were granted bail and are on home detention in the home of a family friend. By Order dated February 7, 2020 in addition to their previous schedule, Ajit and Gulsahil Singh are permitted to attend temple on Friday from 9 am to 11:30 am, Saturday from 10 am to 12 pm, and Sunday from 10 am to 4 pm. The Singhs are permitted to attend a local New York Sports Club from 1 pm to 3:30 pm on Mondays, Tuesdays, Thursdays, and Fridays, are permitted to go to Broadway Commons Mall from 6 pm to 9 pm once every two weeks, and are permitted to visit their friend in Levittown, New York from 4 pm to 10 pm on Sundays. They have been fully compliant with these conditions.

We respectfully request that the bail conditions for Ajit and Gulsahil Singh be modified to additionally allow them to leave the location of their home detention from 1 pm to 9 pm, Monday through Saturday. All other conditions would remain in effect.

We have consulted with the Government and they do not object to this request. We have notified Pre-Trial Services regarding this matter and they do not object to this request.

Thank you for your consideration in this matter.

Respectfully,



Michael Baldassare

cc: Juliana Murray, AUSA  
Steven Brill, Attorney for Gulsahil Singh